

October 15, 2020

VIA ECF FILING

Hon. Colleen McMahon
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 24A
New York, NY 10007

Re: *Swafford v. Generali U.S. Branch et. al.*,
Case No 1:20-cv-07079-CM

Dear Judge McMahon:

Pursuant to Section I.D of Your Honor's Individual Rules and Practices and Local Rule 7.1(d), Plaintiff Mark Swafford ("Plaintiff") and Defendants Generali U.S. Branch and Generali Global Assistance, Inc. (collectively, "Defendants," and together with Plaintiff, the "Parties"), respectfully request that this Court extend all deadlines, including the initial conference and case management plan, and stay the proceedings in this matter until 28 days after the Judicial Panel on Multidistrict Litigation ("JPML") rules on the pending motion for transfer and consolidation or coordination pursuant to 28 U.S.C. § 1407. Judge Caproni is hearing a similar case and issued such a stay sua sponte. See *Morris v. Assicurazioni Group, S.p.A. et al.*, No. 20-cv-04430-VEC, ECF #24. The Parties agree that the requested extension and a stay of all proceedings until 28 days after the JPML rules will avoid the potentially unnecessary use of judicial and party resources if the action is transferred. The Parties further agree that a stay will not prejudice any party in this matter.

Dated: October 15, 2020

/s/ Joseph P. Guglielmo (with consent)

Joseph P. Guglielmo
Scott+Scott Attorneys at Law, LLP
230 Park Avenue, 17th Floor
New York, NY 10169
Tel: (212) 223-6334
Fax: (212) 223-6334
jguglielmo@scott-scott.com

Counsel for Plaintiff

Respectfully submitted,

/s/ Christopher J. Houpt

Christopher J. Houpt
MAYER BROWN LLP
12221 Avenue of the Americas
New York, NY 10020-1001
Tel: (212) 506-2500
Fax: (212) 849-5830
choupt@mayerbrown.com

Counsel for Defendants

